

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA**

POOL SPECIALISTS, INC.,)
)
 Plaintiff,)
)
 v.)
)
)
 RYOBI, LTD.; RYOBI)
 TECHNOLOGIES, INC.;)
 RYOBI HOLDINGS (USA), INC.;)
 ONE WORLD TECHNOLOGIES, INC.;)
 TECHTRONIC INDUSTRIES)
 COMPANY LIMITED;)
 TECHTRONIC INDUSTRIES)
 NORTH AMERICA, INC.;)
 TTI CONSUMER POWER TOOLS,)
 INC.; HOME DEPOT U.S.A., INC.;)
 THE HOME DEPOT, INC.; and)
 HOME DEPOT MANAGEMENT)
 COMPANY, LLC)
)
 Defendants.)

Civil Action No. 5:24-cv-244-FL

DECLARATION OF CHAN CHI CHUNG

I, Chan Chi Chung, under penalty of perjury, declare pursuant to 28 U.S.C. § 1746, as follows:

1. My name is Chan Chi Chung. I am over the age of twenty-one years and am competent to make this affidavit. I am currently the Chief Financial Officer for Techtronic Industries Co. Ltd. (“TTI-HK”). The facts stated in this declaration are based on my personal knowledge and are true and correct.
2. TTI-HK controls 100% of the shares of Techtronic Industries North America Inc. (“TTI-NA”). TTI Consumer Power Tools, Inc., (“TTI-CPT”) (f/k/a One World Technologies, Inc.) is a wholly owned subsidiary of TTI-NA.

3. TTI-HK is a corporation organized under the laws of Hong Kong and is domiciled in Hong Kong. TTI-HK does not regularly conduct business in North Carolina and does not maintain a place of business in North Carolina.

4. TTI-CPT is responsible for the design, manufacture, and distribution of Ryobi-brand lithium-ion battery packs, battery chargers, and leaf blowers, among other products, in North America.

5. TTI-CPT was responsible for the design, manufacture, and distribution of the Ryobi-brand lithium-ion leaf blower, battery pack, and battery charger at issue in this case ("Subject Products").

6. TTI-HK does not directly manage, control, direct, or participate in TTI-CPT's design, manufacture, or distribution of Ryobi-brand lithium-ion battery packs, battery chargers, or leaf blowers. TTI-HK had no direct involvement in the design, manufacture, or distribution of the Subject Products.


7. TTI-HK does not lease or own any real or personal property located in North Carolina. TTI-HK does not have a North Carolina telephone number, mailing address, bank account, or taxpayer identification number, and it does not hold or maintain any North Carolina Licenses.

8. TTI-HK does not have and has never had any employees, servants, or agents in North Carolina.

9. TTI-HK does not directly manage, control, or direct TTI-NA's or TTI-CPT's daily operations. Each is an adequately capitalized independent corporate entity.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 2 day of August 2024.



Chan Chi Chung